



CITY OF BOSTON LAW DEPARTMENT

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Mayor

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Corporation Counsel

December 14, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

RE: GN Docket 09-51

Dear Secretary Dortch:

Attached please find an email from Debra Socia, Principal, Lilla G. Frederick Pilot Middle School, to Jessica Strott, Consumer Adoption Analyst, National Broadband Task Force. In response to a request from Ms Strott, Principal Socia offers her critique of the broadband service delivery aspect of AdoptionPlus, a proposal from the National Cable & Telecommunications Association. Ms Socia offers the view that very few families who qualify under the AdoptionPlus criteria could afford the broadband services as proposed by NCTA. Ms Socia offers her reasons for that conclusion based on her experience as an educator working with the precise population AdoptionPlus targets.

In addition to serving as principal in a Boston public middle school located in one of Boston's lowest income neighborhoods, Ms Socia is also the innovator of Technology Goes Home 2.0 (TGH 2.0) which trains middle school students and their families through an innovative broadband adoption curriculum which provides a netbook computer to the family participants who complete this training. TGH 2.0 is the newest innovation of Boston's Tech Goes Home program which has provided broadband training and computers to thousands of Boston middle and high school students and their families over the past 10 years.

Sincerely,

Donna Sorgi

Senior Assistant Corporation Counsel

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617-635-4097

Sorgi, Donna

From: Deb Socia [dsocia@lgfnet.org]
Sent: Thursday, December 10, 2009 1:43 PM
To: Jessica Strott
Cc: Sorgi, Donna; Matt Mervis
Subject: Re: NCTA service proposal

Jessica,

We offer the following analysis of the Adoption Plus proposal by the Cable Company. In a nutshell, it is an extremely limited service priced well above the means of the substantial majority of the families it purports to target. It proposes an insufficiently reduced price service for too short a time and targeted to too small an audience to make an appreciable impact on increasing broadband adoption among the urban poor.

As we read this proposal, the company would offer 1/2 price on their slowest service and 1/2 price on the modem rental fee for a two-year period to the very poorest families of middle school children who participate in broadband adoption training and then purchase a subsidized computer for home use. We are very familiar with this population since they are the families at the Lilla Frederick who participate in TGH 2.0.

Here are the realities on the ground among the population AdoptionPlus targets, which we believe show the flaws in its assumptions and its proposal. In the Lilla G. Frederick Middle School, 85% of families qualify for reduced or free lunch. Additionally, because so many children arrive at school hungry, the Lilla is a universal free breakfast school. Because the children are hungry during the weekend, we also have free breakfast and lunch on Saturday.

The assumption in AdoptionPlus is that these same families, once educated to the benefits of Internet connection, would pay \$15/month plus fees and taxes for two years and then \$30/month plus fees and taxes is simply not based in the economic realities of poor families.

For parents, purchasing food or paying heating costs will always be the priority, as opposed to paying for connectivity, regardless of how important families feel the Internet may be.

Based on Boston's experience, including at the Lilla Frederick, we believe very few families who qualify under the AdoptionPlus criteria would be able to afford to avail themselves of this plan. There would be a small minority of families who could afford this 1/2 price service but the substantial majority could not. Fewer still could afford the full price commercial service, which would apply at the end of 2 years. Perhaps the best that could be said about AdoptionPlus is that it is better than nothing but is not a significant "something."

AdoptionPlus seems to be another way of saying what we have heard before from cable companies -- that low adoption rates, even among inner city poor, are attributable to a lack of understanding of the value of broadband. In essence, if only poor people saw the value they would pay the price for commercially available broadband.

While it is correct that there is a great deal that needs to be done to educate low income families about the value of internet connections and its ability to make their lives better -- that is the essence of the TGH program offered in 51 Boston schools-- we also can tell you that even when this education is successful as it has been for so many families in Boston who have graduated from TGH, commercially available broadband remains unaffordable. No less an expert in this area than FCC Wireline Bureau Chief Sharon Gillette articulated this conclusion.

In 2007, Sharon Gillett spoke to the Boston Globe about the findings she and others made when serving on Mayor Tom Menino's 2006 Broadband Task Force. Ms Gillett stated that the Task Force found that 80% of Boston schoolchildren had no broadband in their homes and she said:

"It's not an access issue, it's an affordability issue."

The AdoptionPlus proposal is, at best, an inadequate attempt to address the affordability issue. The two-year price reduction does not render commercial service affordable for the vast majority of the urban poor during the two years and certainly not thereafter, no matter how valued Internet connection becomes to those who take advantage of broadband adoption training. This is a problem that requires resolution if we are going to provide all our children with the extended learning time and learning opportunities that are available to those who have the financial means to purchase broadband service.

If the cable companies want to offer something meaningful to address urban digital inclusion, they should consider extending free service to any family qualifying for free or reduced price school lunch and who takes broadband adoption training, and then maintain that service as long as there are eligible school age children in the home.

Boston hopes that among the findings of the FCC's National Broadband Plan, there will be a conclusion that Internet connection for the poorest Americans needs to be provided as a basic government service without additional charge. If we are serious about addressing digital inclusion, we cannot afford to perpetuate the myth that poor people can afford commercial service but are simply not well enough educated to appreciate its value.

We do appreciate the opportunity to share our feelings on this issue. Caring for, supporting, and teaching the children and families of Boston gives us a unique perspective on what the realities of their lives have been and continue to be. We are passionate about finding solutions to this dilemma and look forward to working with others to creatively and successfully address the needs of the families and children we serve.

Thank you.
Deb

Debra Socia
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On Fri, Dec 4, 2009 at 3:16 PM, Jessica Strott <Jessica.Strott@fcc.gov> wrote:

> Hi all,
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> I wanted to flag a proposal that came out this week from the National
> Cable & Telecommunications Association (NCTA). Their summary: "The
> Adoption Plus
> ("A+") pilot program is a proposed two-year, public-private
> partnership designed to promote sustainable broadband adoption for a
> vitally important-but-vulnerable population - middle school-aged
> children in low income households that do not currently receive
> broadband service." The industry would be offering reduced price
> service and free installation for two years for students eligible for
> the National School Lunch program. AT&T put out a press release
> almost immediately saying they'd like to be involved as well, so it looks like this
would have legs beyond the cable providers.

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> This is still just a proposal (and there are some kinks to be worked
> out, especially around the training and PC elements) but do you find
> the service aspect interesting? Think it has potential? Would love
> your reaction when you have a chance!

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> Jessica

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> Jessica Strott
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> Consumer Adoption Analyst
>
> National Broadband Task Force
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